

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

Commodity Futures Trading Commission,)	
)	
Plaintiff,)	Civil Action No. 3:23-cv-11808
v.)	
)	
Traders Global Group Inc., a New Jersey)	Judge Zahid N. Quraishi
corporation, d/b/a “My Forex Funds”;)	
Traders Global Group Inc., a Canadian)	
business organization; and Murtuza)	
Kazmi,)	
)	
Defendants.)	

Stipulation and Joint Motion to Extend Further the Statutory Restraining Order and Continue Preliminary Injunction Hearing

The Commodity Futures Trading Commission (“CFTC”), by and through its counsel, and Defendants Traders Global Group Inc., a New Jersey corporation; Traders Global Group Inc., a Canadian business organization; and Murtuza Kazmi (hereinafter “Defendants”), by and through their counsel, hereby stipulate and jointly move the Court to extend the Statutory Restraining Order (Dkt. 13) further to expire on October 13, 2023 and to continue the preliminary injunction hearing until October 11, 2023, at 11:00 a.m. Eastern Time. In support, the CFTC and Defendants stipulate as follows:

1. On August 29, 2023, the Court entered a Statutory Restraining Order with an expiration of September 12, 2023. (Dkt. 13.)
2. On September 7, 2023, in response to a joint motion of the parties [25] and finding good cause, the Court extended the Statutory Restraining Order

expiration date to September 26, 2023 and continued to preliminary injunction hearing to September 19, 2023, [26].

3. Pursuant to Federal Rule of Civil Procedure 65(b)(2), a court has authority, “for good cause,” to extend the expiration of a restraining order if the parties so consent. Fed. R. Civ. P. 65(b)(2).

4. Here, the parties agree that good cause exists to extend further the expiration of the Statutory Restraining Order through and including October 13, 2023 and to continue the preliminary injunction hearing to October 11, 2023, at 11:00 a.m. Eastern. Such an extension will allow counsel for the parties to continue discussions and determine whether they can reach an agreement on the CFTC’s request for a preliminary injunction (Dkt. 7) without the need for a preliminary injunction hearing.

5. Further, in the event there is a need for a preliminary injunction hearing, extending the Statutory Restraining Order and continuing the preliminary injunction hearing date will give the parties additional time to prepare for the hearing, including taking Defendant Kazmi’s deposition, and give the Court time to review any additional pleadings or evidence the parties may file related to that hearing.

WHEREFORE, the parties hereby jointly move the Court to enter an order pursuant to Rule 65(b)(2) extending the Statutory Restraining Order expiration date to October 13, 2023 and continuing the preliminary injunction hearing to October 11, 2023.

Pursuant to Local Rule 12(c), the submitting attorney certifies that each of the signatories below has expressly agreed to the form and substance of this document and has authorized the filing attorney to submit the document electronically.

September 14, 2023

Respectfully Submitted,

/s/ Ashley J. Burden

Ashley J. Burden
Commodity Futures Trading Commission
Division of Enforcement
77 West Jackson Blvd.
Suite 800
Chicago, IL 60604
(312) 451-2994
kpaulson@cftc.gov
*Counsel for Plaintiff Commodity Futures
Trading Commission*

September 13, 2023

Agreed and Stipulated to By,

/s/ Anthony J. Staltari

Anthony J. Staltari (Atty. ID No. 233022017)
QUINN EMANUEL URQUHART &
SULLIVAN, LLP
51 Madison Avenue, 22nd Floor
New York, New York 10010
Tel: (212) 849-7000
anthony.staltari@quinnemanuel.com

*Counsel for Defendants Traders Global Group
Inc., a New Jersey corporation; Traders Global
Group Inc., a Canadian business organization;
and Murtuza Kazmi*